

SEP 24 1993

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Policies and Rules Implementing
the Telephone Disclosure and Dispute
Resolution Act

)
)
) CC Docket No. 93-22
) RM-7990
)

SOUTHWESTERN BELL TELEPHONE COMPANY
PETITION FOR RECONSIDERATION

Southwestern Bell Telephone Company (SWBT) submits this Petition For Reconsideration (PFR) in the captioned proceeding, requesting the Federal Communications Commission to rule that SWBT's existing general exchange tariffs (offering 900 Service blocking) meet the blocking requirements contained in the Commission's Order.¹

I. SWBT'S GENERAL EXCHANGE TARIFFS ALREADY MEET COMMISSION REQUIREMENTS.

The Order requires SWBT to offer 900 blocking to business and residence customers via the interstate access tariff, even though SWBT already offers such blocking in its state general exchange tariffs.² SWBT's state tariff blocking services meet or exceed the requirements of the Order except in rates for business customers, which are assessed a nonrecurring charge in Oklahoma, Missouri, Arkansas, and Kansas.³ The Order requires federal

¹ Report and Order, CC Docket No. 93-22, released August 13, 1993 (Order).

² Id., paras. 60-63.

³ Residential customers receive the service free in all five SWBT states, as do business customers in Texas.

blocking services to be offered free to all customers for sixty days, and SWBT is prepared to so modify its state tariffs.

Requiring 900 call blocking in the federal access tariff, when SWBT already offers such service in the general exchange tariffs of its five states, is redundant and will give nothing to customers beyond what they already have. This requirement simply constitutes a "make work" project for SWBT at a time when limited resources should be directed toward projects with tangible goals.

Requiring SWBT to include blocking in the Interstate Access Tariff involves more than a wording change, the Order notwithstanding.⁴ New methods and procedures will be required; new billing and accounting procedures must be developed. Customer confusion will follow, as will tariff arbitrage. If SWBT's customers can already obtain 900 blocking services through general exchange tariffs, the only thing 900 blocking in the federal access tariff could add is different rates for the same service. However, since SWBT is willing to bring its state tariffs in line with the Order, this consideration is not applicable and certainly does not justify a make-work project.

II. THE COMMISSION SHOULD ALLOW LECs TO FILE INTERSTATE ACCESS TARIFF LANGUAGE THAT REFERENCES STATE TARIFFS.

The Commission's goal should be to ensure that business and residence customers have 900 Service blocking available to them. To the extent that SWBT general exchange tariffs meet this need, the Commission should not require SWBT to file a redundant interstate access tariff. If the Commission feels compelled to

⁴ See para. 60.

require language in the interstate access tariff (because the Commission is enforcing a federal law), then the Commission should allow SWBT's federal access tariff to refer to the applicable state general exchange tariffs. This would ensure that end users have 900 Service blocking on both the state and federal levels and would also ensure that SWBT does not needlessly incur expenses through a project adding nothing to customers' options.

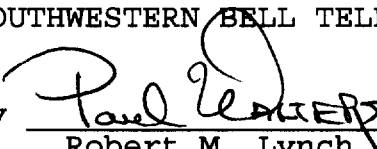
III. CONCLUSION

End users want the protection offered by 900 Service blocking. SWBT, however, need not become involved in unnecessary make-work projects to provide such protection; it already exists. SWBT can modify state tariffs to meet the rate application established by the Order and will share such modifications with the Commission. The customer is fully protected. Nothing more is needed.

Respectfully submitted,

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September 24, 1993

CERTIFICATE OF SERVICE

I, Joseph Meier, hereby certify that the foregoing "Southwestern Bell Telephone Company Petition for Reconsideration", in CC Docket No. 93-22, has been served this 24th day of September, 1993 to the Parties of Record.



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